

Hon. Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

DIANA AND JOSEPH BONGIOVANNI,) Case No. 3:13-cv-05908-RJB
Plaintiffs,)
vs.) **PLAINTIFFS' MOTION FOR**
) **EXTENSION OF TIME TO COMPLY**
) **WITH COURT'S OCTOBER 17, 2013**
) **ORDER**
THE SCHREIBER LAW FIRM, PLLC,)
Defendant.) NOTE ON MOTION CALENDAR:
) January 2, 2014
)

Plaintiffs respectfully submit this motion for an extension of time to comply with the deadlines set by this Court's October 17, 2013 order. (Doc. 4).

1. On October 15, 2013, Plaintiffs filed their original complaint in this matter against "The Schreiber Law Firm, LLC." (Doc. 1).

2. Subsequently, Plaintiffs learned that the proper entity is "The Schreiber Law Firm, PLLC," and have amended their complaint accordingly. (Doc. 6).

3. On December 30, 2013, Plaintiffs sent a request to Defendant to waive service of the amended complaint as provided by Fed. R. Civ. P. 4(d).

4. On October 17, 2013, this Court issued an initial scheduling order, setting the following deadlines:

Deadline for FRCP 26(f) Conference: 1/2/2014

1 Initial Disclosures Pursuant to FRCP 26(a)(1): 1/8/2014

2 Combined Joint Status Report and Discovery Plan: 1/15/2014

3 (Doc. 4).

4 5. Because Defendant has not yet appeared in this matter, and the deadline for it to
5 do so would not be until February 28, 2014, Plaintiffs respectfully request a 90-day extension
6 of time to comply with the above deadlines.
7

8 6. This motion is not made for any dilatory purpose, but only to allow sufficient
9 time for Defendant to appear and for the parties to be able to comply with these deadlines.

10 WHEREFORE, Plaintiffs respectfully request an extension of 90 days to comply with
11 the deadlines set in this Court's October 17, 2013 order. A proposed order is attached.
12

13 Respectfully submitted this 2nd day of January, 2014.

14 s/Jon N. Robbins
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